

## REMARKS

Applicants have thoroughly considered the April 2, 2007 Final Office action and the June 6, 2007 Advisory action and respectfully request reconsideration of the application as presented and in light of the following remarks. Claims 1, 8, and 11 are presented in the application for further examination. Applicants respectfully request that favorable reconsideration of the application in light of the following remarks and the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the claims in condition for allowance if necessary.

Applicants acknowledge the Office's acceptance of the drawings.

### **Claim Rejection under 35 U.S.C. §102(e)**

Claims 1-3, 5, 8-10, 14 and 15 stand rejected under 35 U.S.C. §102(e) as being anticipated by Chasen et al. (US Patent No. 6,760,721). Applicants submit that Chasen fails to disclose or suggest each and every element of the rejected claims for at least the following reasons.

Amended claim 1 recites, in part, "identifying a property delimiter included in the first property data in the first metadata field, said **property delimiter differentiating multiple properties within the first property data and indicating the first property data having multiple properties therewith...**, and wherein the identified first property and the identified second property are displayed as a second level of the hierarchically organized levels **based on the property delimiter differentiating and indicating presence of the first property data and the second property data.**"

Applicants disagree with the Office's reading and understanding of Chasen. The Office disagreed with Applicants previous argument on pages 16-17 of the Office action and submitted that Chasen discloses or suggests the feature of "parsing the first property data included in the first metadata field; identifying a property delimiter included in the first property data in the first metadata field..." In finding the support for such argument, the Office argues that the "parsing feature" is also viewed as "the systems['] traversal of tree [sic] master tree 122, grouping tree 124, and playlist 126 to identify the CLEAN and DIRTY flag or delimiter)." Office action, page 3. With respect to the "identifying a property delimiter" feature, the Office argues that "the

property delimiter corresponds to a CLEAN or DIRTY delimiter that has been applied to any metadata or data changes by the user, wherein the system marks a node with a CLEAN or DIRTY status). Office action, page 17.

Applicants respectfully submit the amended recitation is distinguishable over the cited art because the property delimiter differentiates multiple properties within the first property data and indicates the first property data having multiple properties therewith. In addition, the identified first property and the identified second property are displayed **as a second level of the hierarchically organized levels based on the property delimiter differentiating and indicating presence of the first property data and the second property data**. In other words, the delimiter does not merely indicating a status or a flag as in Chasen. To the contrary, the property delimiter indicates the presence of multi-valued metadata fields such that the multi-valued (i.e., multiple properties in) the metadata fields will be displayed to the user as a second level of the hierarchically organized levels. Applicants submit that the cited art fails to disclose or suggest at least this aspect of the invention. (See also Specification, paragraph 0024).

Because Chasen fails to disclose each and every element of claim 1, claim 1 is allowable over the cited art. Dependent claims 2-3 and 5 add additional features to claim 1 and are also patentable over the cited art. As such, Applicants respectfully submit that the rejection of claims 1-3 and 5 under 35 U.S.C. §102(e) should be withdrawn.

Also, claim 8 recites similar limitations as in claim 1 and, for at least the same reasons above, is patentable over Chasen because Chasen fails to disclose or suggest the features of “**identifying instructions for identifying a property delimiter included in the first property data in the first metadata field, said property delimiter differentiating multiple properties within the first property data and indicating the first property data having multiple properties therewith....**, and wherein the identified first property and the identified second property are displayed as a second level of the hierarchically organized levels **based on the property delimiter differentiating and indicating presence of the first property data and the second property data**” (emphasis added). Not only does Chasen fail to disclose or suggest the property delimiter indicating multiple properties within the first property data, Chasen also fails to disclose or suggest the identified first property and the identified second property are displayed as a second level of the hierarchically organized levels **based on the property delimiter**

**differentiating and indicating presence of the first property data and the second property data.** Therefore, Chasen cannot anticipate claim 8. Claims 9-10 include features not taught by Chasen. Hence, the rejection of claims 8-10 under 35 U.S.C. §102(e) must be withdrawn.

Similarly, for at least the reasons above, independent claim 14 recites features described above and is also patentable over the cited art. Claim 16 depends from claim 14 and is also patentable. Therefore, the rejection of claims 14 and 16 under 35 U.S.C. §102(e) should be withdrawn.

#### **Claim Rejection under 35 U.S.C. §103(a)**

Claims 6, 7, 12, 13, and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Chasen in view of Dwek et al. (US Patent No. 6,248,946). Claims 6 and 7 depend the independent claim 1, claims 12 and 13 depend from the independent claim 8, and claim 16 depends from the independent claim 14. Applicants submit that Dwek fails to cure the deficiencies of Chasen, and that the combined references fail to disclose or suggest each and every element of the rejected claims for at least the reasons above. In particular, although Dwek relates to subgenres, Dwek fails to disclose at least the features of parsing the first property data included in the first metadata field, identifying **a property delimiter** included in the first property data in the first metadata field, said property delimiter differentiating multiple properties within the first property data and indicating the first property data having multiple properties therewith..., and wherein the identified first property and the identified second property are displayed as a second level of the hierarchically organized levels based on the property delimiter differentiating and indicating presence of the first property data and the second property data. Hence, the combined references of Chasen and Dwek do not disclose or suggest each and every element of claims 6, 7, 12, 13, and 16. Because the Office fails to establish the *prima facie* elements of an obviousness rejection, Applicants submit that the rejection of claims 6, 7, 12, 13, and 16 under 35 U.S.C. §103(a) should be withdrawn.

In view of the foregoing, applicants submit that claims 1-3, 5-10, 12-14, and 16 are clearly distinguishable and are allowable over the cited art. It is felt that the above amendments do not introduce new elements or features of the coverage of the invention as claimed. It is felt

that a full and complete response has been made to the Office action and, as such, places the application in condition for allowance. Such allowance is hereby respectfully requested.

Applicants have reviewed the prior art made of record and not relied upon by the Office in the Office and have determined that none of these references anticipate or make obvious the recited invention in light of the foregoing amendment. The fact that Applicants may not have specifically traversed any particular assertion by the Office should not be construed as indicating Applicants' agreement therewith.

**The Applicants wish to expedite prosecution of this application. If the Examiner deems the claims as amended to not be in condition for allowance, the Examiner is invited and encouraged to telephone the undersigned to discuss making an Examiner's amendment to place the claims in condition for allowance.**

Applicants do not believe a fee is due. If, however, the Commissioner determines otherwise, other deficient fees may be charged during the entire pendency of this application to Deposit Account No. 19-1345.

Respectfully submitted,



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Via EFS